

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

v.

PAGAN-RODRIGUEZ et al,
Defendant.

CRIMINAL NO. 22-082 (RAM)

JOINT MOTION INFORMING OF CASE STATUS

TO THE HONORABLE COURT:

The United States of America, by and through the undersigned attorney, very respectfully states and prays as follows:

1. On March 3, 2022, a Grand Jury returned a 20-defendant indictment in the instant case. DE No. 3.
2. This Honorable Court ordered the parties to file a Joint Status Report by today. DE No. 105.
3. The Government handed a first discovery package on March 31, 2022 and is in the process of organizing a second discovery package, which should be handed within the next thirty (30) working days. The second discovery package will consist of extensive hours of media material, to include videos and photos, as well as documentary evidence.
4. Also, the Government will be coordinating individual evidence proffer conference calls within the next thirty (30) days, to provide an opportunity to open discussions of the case and engage in potential negotiations.

5. As soon as the second discovery package has been produced and the attorneys have had the opportunity to review the same, proffer sessions will be held, and negotiations will commence.

6. The Government respectfully recommends at least sixty (60) days to submit an updated Joint Status Report to inform the court of the progress of these stages.

WHEREFORE, and in view of the foregoing the United States of America respectfully requests that the Honorable Court take notice of the above mentioned and grant a term of 60 days for a Further Status Report to inform the Court of the progress of the case.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 21st day of April 2022.

W. STEPHEN MULDROW
United States Attorney

s/ Cristina Caraballo-Colón
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

W. STEPHEN MULDROW
United States Attorney

s/ Cristina Caraballo-Colón
Cristina Caraballo-Colon
Special Assistant U.S. Attorney
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